

# **EXHIBIT B**

Daniella Esther Rodriguez - 6/5/2025

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UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
CIVIL ACTION NO.: 4:4-CV-10017 MARTINEZ SANCHEZ

AKARI JOHNSON, ET. AL.,

Plaintiff,

vs.

MMI 82, LLC, ET. AL.,

Defendant.

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ZOOM DEPOSITION

Thursday, June 5, 2025

10:00 a.m. - 2:31 p.m.

DEPOSITION OF DANIELLA ESTHER RODRIGUEZ

Taken before JANSEN VIANA, Court Reporter, a  
Notary Public for the State of Florida at Large,  
pursuant to Notice of Taking Deposition filed in the  
above-styled cause.

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1 Q You would --

2 A I see that.

3 Q You wouldn't have put your name there if it  
4 wasn't you?

5 A Like I said, I did review the letter. I wrote  
6 my name. She helped me write the letter, but I signed  
7 off on the letter.

8 Q Got it. The second paragraph states, in this  
9 period of time, they were creating fake invoices  
10 through their online companies, Hospitality Hub U.S.A.  
11 and iConnect, they were overcharging guests on these  
12 said invoices compared to our regular room rates.

13 They would send a link to the guests for a third-  
14 party portal for payment where they would receive the  
15 funds directly into their account. Is this paragraph  
16 correct?

17 A It is.

18 Q And it's and Hospitality Hub and iConnect are  
19 companies owned by Hazel?

20 MR. BARROUKH: Objection to form.

21 A I am not sure.

22 Q (By Mr. Narula) The first paragraph of the  
23 letter states that the letter relates to employees  
24 Hazel C. Thompson and Akari Thompson and in  
25 parentheses, Johnson, who are employed with Casa

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1 Morada. Correct?

2 A Correct.

3 Q So, if the second paragraph references, they  
4 were creating fake invoices. You're referring to Hazel  
5 and Akari, right?

6 A I am not sure exactly who was doing the fake  
7 invoices, but it was under them.

8 Q What do you mean by under then?

9 A Under their name, the companies.

10 Q Okay. So, the Hospitality Hub and iConnect --

11 A Correct.

12 Q -- are Hazel and Akari's companies?

13 A I'm not a --

14 MR. BARROUKH: Objection to form.

15 A -- 100% sure.

16 Q (By Mr. Narula) But are they under their  
17 names?

18 A I am not 100% sure.

19 Q What do you mean by it? They're under their  
20 names?

21 A I don't recall, honestly at that time, it's  
22 already a year ago. So, what I found at that time is  
23 what I found, and I wrote, I don't recall exactly right  
24 now what was under whose name.

25 Q Okay. You wrote their online companies,

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1 Hospitality Hub and iConnect by their who are you  
2 referring to?

3 A Like I just mentioned I am not 100% sure you  
4 would have to double check online on Sunbiz or wherever  
5 you can get that information.

6 Q At the time that this was written, would you  
7 check on Sunbiz?

8 A Yes, I would have.

9 Q How did the hotel discover these  
10 discrepancies?

11 MR. BARROUKH: Objection to form.

12 A I was new, I never worked in a hotel, and I  
13 was just trying to learn the system, I was playing,  
14 looking at the reservations and seeing how they were  
15 booked, how many days, the rates.

16 Q (By Mr. Narula) I understand what you did to  
17 investigate, but my question is a little different.  
18 How did this come to the attention of the hotel to even  
19 look into?

20 MR. BARROUKH: Objection to form, calls for  
21 speculation.

22 A I am not changing. I can't really change my  
23 answer. I was just trying to learn my job, my position,  
24 the system, and just, I was just looking around and I  
25 found stuff.

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1 MR. NARULA: Okay.

2 A Yeah, I was just looking around to the  
3 reservations, and then I just realized certain big  
4 parties or certain stuff was getting paid to the same  
5 account, like, the same person was paying. And I  
6 thought that was weird. So, then I looked into it.

7 Q (By Mr. Narula) Okay. Now I got it. You are  
8 the one that --

9 A Yes.

10 Q -- is looking at the system --

11 A Yes.

12 Q -- you saw these discrepancies? Understood.  
13 And what did you do when you saw these discrepancies?

14 A I brought it to Oneil's attention.

15 Q Did the hotel take action?

16 MR. BARROUKH: Objection to form. You can  
17 answer.

18 A No.

19 Q (By Mr. Narula) At the time that you  
20 discovered this was Hazel and Akari still employed with  
21 the hotel?

22 A I never met Hazel. I met Akari for 20 seconds  
23 when I went in for my interview to meet Oneil at the  
24 hotel and that's it. I never had any communication, or  
25 never -- nothing after any of that.

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1 Q So, this letter was drafted after the time  
2 Hazel and Akari left the employer hotel?

3 A Correct.

4 Q Do you recall around what time that you  
5 discovered the discrepancies in the system that you  
6 just referenced?

7 A I did not.

8 MR. BARROUKH: Objection to form. You can  
9 answer.

10 Q (By Mr. Narula) Is it sometime in 2024?

11 MR. BARROUKH: Objection to form.

12 A I don't recall.

13 Q (By Mr. Narula) Was it soon after you were  
14 employed?

15 A Possibly.

16 Q Like within the first month or two?

17 A I am being as honest as I can be. I don't  
18 want to tell you a month and then it was three months.  
19 I am not sure.

20 Q Okay. If I showed you a copy of an e-mail  
21 with a date on it referring to a letter, could it  
22 refresh your recollection?

23 A If that's what the e-mail says, and then  
24 that's --

25 Q Okay. I am handing you what we'll mark as

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1       Exhibit 4. At the bottom of the first page, it says  
2       it's an e-mail from you to --

3           A       That was a guess.

4           Q       Louisesprimont@yahoo.

5           A       Sprimont. Louisesprimont@yahoo.com.

6           Q       louisesprimont@yahoo.com spelled, L-O-U-I-S-  
7       E-S-P-R-I-M-O-N-T @yahoo.com and this e-mail is dated  
8       January 17, 2024, and subject is requested letter,  
9       right?

10          A       Correct.

11                   (Thereupon, Defendant's Exhibit 4 was entered  
12                   into the record.)

13          Q       (By Mr. Narula) And the e-mail from you says,  
14       Good Evening, Louise, Ellen told me you were requesting  
15       a letter to provide you with the credit card companies.  
16       Please let me know if you need to make any adjustments.  
17       Right?

18          A       Correct.

19          Q       So, this letter was drafted in January 2024?

20          A       Um-hum. Yes.

21          Q       That would be about a month after you started  
22       the job?

23          A       Correct.

24          Q       Can you explain what happened to Mr. Primont  
25       that he --

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1 reservation system for the hotel to the Sheriff.

2 Correct?

3 A Yes.

4 MR. BARROUKH: Objection to form.

5 (Thereupon, Defendant's Exhibit 6 was entered  
6 into the record.)

7 Q (By Mr. Narula) Okay. And this is a Police  
8 Report. Do you see on the first page towards the  
9 bottom, it says reporting person, Ellen Summers?

10 A Correct.

11 Q Okay. And do you see on the last page, do you  
12 see the first two suspects, Hazel Thompson?

13 A Yes.

14 Q Okay. And in the description below, it says,  
15 on January 3rd, 2024, I responded to Casa Morada  
16 Boutique Hotel located at 136 Madeira Road Islamorada,  
17 Florida, within Monroe County, in reference to Grand  
18 Theft, right?

19 A Correct.

20 Q This is related to the incident you described  
21 earlier, right?

22 A Yes.

23 Q That also relates to Exhibit 3 in your -- the  
24 letter that we marked as Exhibit 3?

25 A Yes.

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1 Q Okay. And in fact, on the second page, you  
2 see that one of the victims is Louise Sprimont, right?

3 A Correct.

4 Q She's the same lady that you exchange e-mails  
5 with regarding your letter, which we marked as Exhibit  
6 3, right?

7 A Correct.

8 Q Okay. Do you see that there's several victims  
9 here on Page 2. The first one is Sabine, Wiedebach  
10 Dartnell, W-I-E-D-E-B-A-C-H D-A-R-T-N-E-L-L?

11 A Yes.

12 Q Do you recognize that name?

13 A I do.

14 Q And was she also a victim of fraud?

15 MR. BARROUKH: Objection to form. Assuming  
16 facts are not in evidence, calls for speculation.

17 A She was a guest. I just recall seeing her  
18 name on the system.

19 Q (By Mr. Narula) Okay. And she was someone who  
20 made a credit card dispute?

21 MR. BARROUKH: Objection to form.

22 A I don't recall. The only one I can honestly  
23 recall is Louise because I spoke back and forth with  
24 her for quite some time, but I don't recall any of the  
25 other names.

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1 Q (By Mr. Narula) So in addition to Sabine  
2 Wiedebach and Louise Sprimont there's also a third  
3 victim listed by the name of Cassandra Russell. Do you  
4 recognize her name?

5 A So, I believe -- so this, I don't know if it  
6 was a birthday party or a wedding. It was some kind of  
7 event that was under Louise Sprimont. So, the whole  
8 reservation was under Louise and then the rooms were  
9 booked under her guests. So, I don't recall these  
10 names. It was all under Louise Sprimont. I believe  
11 these were her guests.

12 Q So, is it all under one master reservation?

13 A Correct.

14 Q These are just different rooms --

15 A Correct.

16 Q -- associated with that reservation?

17 A Correct.

18 Q As specific to the third victim Cassandra  
19 Russell. Do you recognize that name?

20 A I do not.

21 Q Do you see that she lives in Glenview,  
22 Illinois?

23 A I am sorry. What page are you on?

24 Q Same page, 2 under her name you will see an  
25 address.

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1 A Yes, that's a different location than Ms.  
2 Sprimont who's in Winter Park, Florida. Right?

3 A Um-hum. Correct.

4 Q On the next page there's a fourth victim  
5 listed. It's Kristen Howard. Do you recognize that  
6 name?

7 A I do not.

8 Q Okay. And on the next slide, there's a  
9 business listed as a victim, Casa Morada Resort.  
10 Correct?

11 A Yes.

12 Q This report was compiled based on the  
13 information that you provided to the police. Right?

14 MR. BARROUKH: Objection to form.

15 A That Ellen provided.

16 Q (By Mr. Narula) That Ellen provided?

17 A Yes.

18 Q You collected the information --

19 A Yes.

20 Q -- and gave it to Ellen.

21 A And she helped me as well.

22 Q Okay. And the information that you and Ellen  
23 collected was provided to the police?

24 A Yes.

25 Q And that's what gave rise to this police

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1 report?

2 A Yes.

3 MR. BARROUKH: Objection to form. You can  
4 answer.

5 Q (By Mr. Narula) Do you see on Page 4 there's  
6 a charge listed at Grand Theft, and it says felony?  
7 Are you aware of whether the police ever proceeded with  
8 criminal charges in connection with this matter?

9 A I am not aware.

10 Q On the last page, the reporting officer is  
11 Mary Matthews. Did you have any interaction with Mary  
12 Matthews?

13 A I saw her on property, but I didn't verbally  
14 speak with her.

15 Q Would you recognize her if you saw her again?

16 MR. BARROUKH: Objection to form.

17 A Honestly, not really.

18 Q (By Mr. Narula) Okay. You could put that  
19 aside. I am showing you what we'll mark as Exhibit  
20 Number 7, which is a separation and release agreement  
21 between the hotel and you. Do you recognize it?

22 A Yes.

23 (Thereupon, Defendant's Exhibit 7 was entered  
24 into the record.)

25 Q (By Mr. Narula) Did you sign the document on

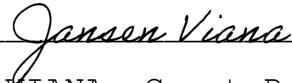
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1 CERTIFICATE OF OATH  
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4  
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6 I, JANSEN VIANA, Court Reporter, Notary Public, State  
7 of Florida, certify that DANIELLA ESTHER RODRIGUEZ  
8 personally appeared before me on the 5<sup>th</sup> day of June 2025,  
9 and was duly sworn.

10 Signed this 20th day of June 2025.

11  
12  
13   
14 JANSEN VIANA, Court Reporter  
15 Notary Public, State of Florida  
16 Commission No. HH678164  
17 Commission Expires: 05/21/2029  
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CERTIFICATE OF REPORTER

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I, JANSEN VIANA, Court Reporter, certify that I was authorized to and did report the Deposition of DANIELLA ESTHER RODRIGUEZ; that a review of the transcript was requested; and that the transcript is a true and correct record of my notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties, attorneys or counsel connected with the action, nor am I financially interested in the action.

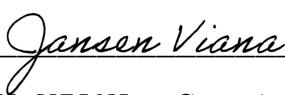
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Dated this 20th day of June 2025.

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JANSEN VIANA, Court Reporter

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